

SANTA MONICA MOUNTAINS CONSERVANCY

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September 22, 2003

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ENVIRONMENTAL
UNIT

Mr. Jimmy Liao
Los Angeles City Planning Department
Environmental Review Section
200 N. Spring Street, Room 763
Los Angeles, California 90012

**Draft Environmental Impact Report
for the Mountaingate Project
EIR No. 99-3251-SUB**

Dear Mr. Liao:

The proposed Mountaingate development project in the City of Los Angeles is located within the Santa Monica Mountains Conservancy Zone. The Santa Monica Mountains Conservancy (Conservancy) is concerned about potential significant adverse impacts to the visual, biological, and recreational resources located on the project site. The DEIR must be recirculated to include 1) analysis of the impacts to the visual resources in the area, 2) analysis of the impacts to the Canyonback trail, and 3) an alternative that reduces fill in Bundy Creek to less than half an acre.

Project Design

The proposed project includes the construction of 22 homes along Stoney Hill ridge and 7 homes along Canyonback ridge (separating Mandeville and Bundy Canyons). Construction of these homes requires placing 965,000 cubic yards of fill in Bundy Canyon, which is the canyon in between the two ridges. The 7 homes along Canyonback ridge, would require a total of 2.69 acres of grading and 68,571 cubic yards of soil excavated per home. Whereas the development along Stoney Hill ridge will require 1.12 acres of grading with 23,374 cubic yards of soil excavated per home. Building the homes along Canyonback ridge is not an environmentally sensitive alternative. The project must reduce the amount of fill in Bundy Canyon, a USGS blueline stream, with a well-developed riparian corridor. This could potentially be accomplished by stair-stepping the pads.

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Recreation Impacts

The DEIR is deficient for not analyzing and mitigating the unavoidable significant adverse impacts to the Canyonback trail that runs through the property. The trail runs from Westridge Canyon Back Park (Eastport property) to the north along the Canyonback ridgeline on the project site south to the Hilton Open Space. This trail is never mentioned in the DEIR. The development along Canyonback ridge will completely sever the trail along the ridge. Mitigation for impacts to the trail must include realigning and constructing an adequate trail. The trail alignment must be approved by the Conservancy and constructed at the developer's cost to the satisfaction of the Conservancy.

Also, this section of the DEIR incorrectly states that Will Rogers State Historic Park and Topanga State Park are part of the Conservancy's parklands system. Those parks are owned and managed by the California Department of Parks and Recreation.

Visual Impacts

We do not concur that the project will have no adverse impacts on the visual resources of the surrounding area. The DEIR is deficient for not providing sufficient analysis on impacts to the visual resources in the area. The DEIR included one inadequate photograph each for the existing view in lower Mandeville Canyon and the northern portion of the Sepulveda Pass. The DEIR must also include an analysis of visual impacts for parkland and other public lands in upper Mandeville Canyon, the trails in Westridge-Canyon Back Park, the trail along Canyonback ridge on the project site, and the trails in the Sepulveda Pass Open Space east of the 405 Freeway. The DEIR must include both before and after photographs for all of the above-referenced locations, including the two discussed in the DEIR.

The development will be located on two ridgelines. The Canyonback ridge is especially prominent. Building along these ridgelines will significantly impact the viewsheds in the area. The DEIR is incorrect in stating that no significant impacts to visual resources will occur because 1) the project would only extend development that already exists along the ridgelines and 2) less than ten percent of the project site will be altered. These are not adequate justifications of why, as stated in the DEIR, there are no impacts to visual resources.

Biological Resources

The DEIR is deficient for stating that the project site is not used as a wildlife movement corridor. Wildlife use the project site to move between the eastern and western sides of the 405 Freeway via the Sepulveda Boulevard underpass. The Sepulveda Pass Open Space is immediately adjacent to the Sepulveda Boulevard underpass on the eastern side of the 405

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Freeway. The project site is the critical connection between the open space to the west, including Topanga State Park and Westridge-Canyon Back Park, and the Sepulveda Boulevard underpass.

Riparian resources are critical for maintaining wildlife populations. The DEIR states that 3.2 acres of southern mixed riparian woodland, identified as special status by the California Department of Fish and Game (CDFG), will be impacted by the project. The project will also impact 9.40 acres of CDFG jurisdictional streambed. The loss of riparian habitat is a significant impact that must be reduced to a half an acre or less. The drainages onsite currently have high quality riparian habitat and do not need to be restored. We concur that all impacts to riparian habitat should be replaced at a ratio of 5:1. However, this replacement must occur offsite in a location that is currently degraded.

We concur with the replacement ratios set forth in the DEIR for impacts to all of the other plant communities. Habitat on the project site is of high quality, except for the area of the landfill. The landfill for the most part is covered with ornamental and non-native plants. Mitigation for the impacts to the different plant communities should only occur on the former landfill area. This will improve the quality of habitat for wildlife using the property to access the Sepulveda Boulevard underpass.

Open Space

The DEIR states that the majority of the undeveloped land on the project site totaling 424 acres will be dedicated as permanent open space. The Mountains Recreation and Conservation Authority (MRCA) is the most appropriate agency to accept the dedication and manage the open space. The MRCA would accept in fee lots 30 and 31. However, the dedication should exclude all aspects of the cut and fill slopes on lot 31 leading down to Bundy Creek unless an agreement is drafted excusing the MRCA from all maintenance and liability associated with the drainage feature. A conservation easement covering lot 32 (former landfill) should be granted to the MRCA.

Extensive fuel modification is required on the open space, especially in the areas near Mandeville Canyon and the homes in adjacent Mountaingate. The open space and Canyonback trail will also require maintenance and repair. A landscape maintenance district must be established as a condition of issuing a certificate of occupancy for all of the lots in the proposed development. The district would be administered by the City of Los Angeles. The district would provide \$75,000 of net funding to the MRCA for brush clearance, as well as open space and trail maintenance and repair. The funding must include a CPI based inflation adjustment. Any excess money per year will go into a contingency fund restricted for use on the subject property and administered by the MRCA.

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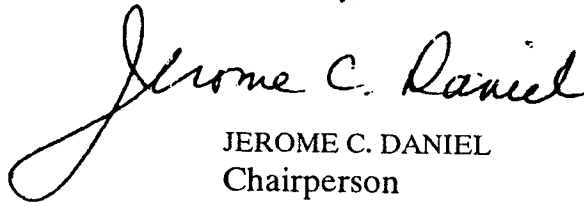
Lighting

We concur that the increase in light and glare from the project is a significant impact. The project will not only impact wildlife species on the project site and special status species offsite, but it will impact special status species located on the project site and wildlife movement in the area. The DEIR must provide an adequate detailed description of all of the lighting that would be used on the project site. To adequately determine potential adverse ecological impacts from lighting and provide measurable and enforceable mitigation measures, a lighting plan must be provided. Such a plan must include photometric mapping of offsite illumination.

Every attempt should be made to keep lighting impacts to a minimum. While implementing downcast luminaries along the perimeter of natural areas is a good start, it does not adequately mitigate the impacts of lighting on wildlife. Other methods that should be considered for implementation include (1) the installation of low pressure sodium lights, which produce light in a spectrum that attracts the fewest number of moths and insects, (2) no roof-mounted lighting structures, (3) no light source exceeding 250 watts, (4) lighting structures within parking areas not exceeding sixteen feet in height, including the base, (5) all exterior lighting directed downward, (6) the installation of lighting controlled by sensors, and (7) light sources not exceeding one footcandle of illumination shall be placed within 100 feet of the edge of development area next to any open space.

The DEIR must be recirculated to include 1) analysis of the impacts to the visual resources in the area, 2) analysis of the impacts to the Canyonback trail, and 3) an alternative that reduces fill in Bundy Creek to less than half an acre. We appreciate the opportunity to comment. Please direct any questions and future correspondence to Susan Shanks of our staff at (310) 589-3200 ext. 124.

Sincerely,

A handwritten signature in cursive script that reads "Jerome C. Daniel". The signature is written in dark ink and is positioned above the printed name and title.

JEROME C. DANIEL
Chairperson